

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2-CR-331-JFH
)	
ILYESS TALBI,)	
)	
Defendant.)	

**MOTION TO EXCUSE THE PRESENCE OF DEFENDANT TALBI AT THE
HEARING ON THE MOTIN FOR COMPLEX CASE**

Defendant, ILYESS TALBI, by and through his attorney, Stephen J. Knorr, respectfully files this motion to excuse Mr. Talbi from attending the hearing set for December 7 at 9:15 on the unopposed motion to declare this matter a complex case. Dkt. # 142. In support, Mr. Talbi states as follows:

Assistant United States Attorney Matthew Cyran does not object to this motion.

Mr. Talbi is presently on bond and living in Columbus, Ohio. He is twenty (20) years sold, lives with his parents and three siblings, and is unemployed. Undersigned counsel has been appointed to represent him based on a Criminal Justice Act financial affidavit. After his arrest in Ohio, Mr. Talbi was permitted to attend his initial appearance and arraignment and plea in this District via video based on his limited financial resources. Mr. Talbi does not have the funds to travel to and from Tulsa for the hearing on the motion and has agreed

that his presence should be waived.

Since the hearing will address matters that concern counsel for all parties and not directly the defendants, Mr. Talbi requests that his presence be waived

Respectfully submitted,

s/ Stephen J. Knorr

Stephen J. Knorr

Attorney at Law

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Attorney for Ilyess Talbi

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2023,, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who are parties to this matter.

s/ Stephen J. Knorr

Stephen J. Knorr